

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KEVIN WAGNER,	:	CIVIL ACTION NO.: 02-cv-4713
	:	
<i>Plaintiff,</i>	:	
	:	
VS.	:	
	:	
BRISTOL TOWNSHIP,	:	
	:	
<i>Defendant.</i>	:	

**PLAINTIFF'S MOTION TO EXTEND THE DISCOVERY
DEADLINE AND ALL OTHER DATES**

Plaintiff, Kevin Wagner, by and through his undersigned counsel, hereby moves to extend the Court imposed discovery deadline and all other dates an additional sixty (60) days in the within action and in support thereof aver the following:

1. That this action was commenced by the Plaintiff on July 16, 2002.
2. That subsequent to the commencement of the within action, the Court affixed a discovery deadline in this matter of July 10, 2003.
3. That Kevin I. Lovitz, Esquire, the attorney who was responsible for the handling of this matter on behalf of the Plaintiff, is no longer employed at the law firm of Lovitz & Gold, P.C. As a result of the aforesaid, this matter is presently being reassigned and reviewed within the firm.

4. Although the parties continue to work arduously to schedule and conduct all necessary oral and written discovery in a timely fashion, Mr. Lovitz's departure has caused some delay in this regard.

5. Therefore, given the time frame for discovery imposed by the Court, it is unlikely that the parties will be able to complete discovery prior to the Court imposed deadlines in this action.

6. Accordingly, based on the above, counsel respectfully request that this Court extend the discovery deadline an additional sixty (60) days to facilitate the discovery needs of the parties in this action. It is further respectfully requested that all other Court imposed deadlines be concurrently extended in accordance with the discovery deadline.

7. Counsel for the Defendants do not oppose this Motion to Extend the Discovery Deadline and all other dates.

WHEREFORE, the undersigned counsel requests that the discovery deadline, as well as all other Court imposed deadlines be extended an additional sixty (60) days.

LOVITZ & GOLD, P.C.

By:

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